

Registration Jacket 72265-1

Volume 3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460-0001



OFFICE OF  
CHEMICAL SAFETY AND  
POLLUTION PREVENTION

March 8, 2012

Robert Nance  
Security Equipment Corporation  
330 Sun Valley Circle  
Fenton, MO 63026

Subject: Reassignment of Pesticide Products from the Registration Division to the  
Biopesticides and Pollution Prevention Division

Dear Mr. Nance:

This letter is to inform you the following products have been reassigned to the  
Biopesticides and Pollution Prevention Division:

- Frontiersman Bear Attack Deterrent, EPA Reg. No. 72265-1

Please note that this reassignment will also apply to Sabre Pet Protector Dog Deterrent,  
EPA File Symbol 72265-G, pending registration.

You may address future submissions to the Biochemical Pesticides Branch, Team 91.  
Please also be aware that any submission under PRIA will now be subject to the Biopesticides  
and Pollution Prevention Division fee schedule. Further inquiries regarding these products may  
be directed to Ms. Linda Hollis, chief of the Biochemical Pesticides Branch. Ms. Hollis can be  
reached by phone at (703) 308-8733, or by email at [Hollis.Linda@epa.gov](mailto:Hollis.Linda@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Meredith Laws".

Meredith Laws, Chief  
Insecticide-Rodenticide Branch  
Registration Division (7505P)  
Office of Pesticide Programs



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

December 7, 2006

2/7/  
360 5-789860  
1130

Security Equipment Corporation  
330 Sun Valley Circle  
Fenton, MO 63026

Attention: Mr. Robert Nance

**Subject** Frontiersman® Bear Attack Deterrent  
EPA Reg. No. 72265-1  
Submission of January 24, 2006

**Purpose** This submission, under sec 3 of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), includes Storage Stability and Corrosion Characteristics data to support the prior amendment to increase the amount of active ingredient from 1.4 to 2.0% Capsaicin and Related Capsaicinoids, approved on December 22, 2004.

**Review** We have reviewed the data (MRID No. 467518-01 to -05 and have concluded that they do not meet our requirements for an acceptable study for the following reasons:

1. There is no statement that the studies were conducted according to Good Laboratories Practices (GLP).
2. Samples were not conducted at the standard intervals of 3, 6, and 9 months.
3. The study did not specify the type of packaging.
4. The study did not specify the test conditions (e.g., temperature and humidity).
5. The study did not specify if the method had been validated.

DATE OUT: 24 Oct 2006

SUBJECT: **PRODUCT CHEMISTRY REVIEW** MP [ ] EP [x]  
DP BARCODE No.: D329258  
Reg. File Symbol No.: 72265-1  
PRODUCT NAME: Frontiersman Bear Attack Deterrent  
COMPANY: Security Equipment Corporation  
Decision No.: 367536 PC CODE: 070701  
FOOD USE: [ ] Integrated Formulation [ ]

FROM: Bruce F. Kitchens, Chemist  
Technical Review Branch  
Registration Division (7505C)

TO: RM #07, John Hebert/Dan Peacock  
Insecticide-Rodenticide Branch (7505C)  
Registration Division (7505C)

*Bruce F. Kitchens*  
*24 Oct 2006*

*SBM 10726146*

#### **INTRODUCTION:**

The registrant, Security Equipment Corporation, is submitting product chemistry data to support the conditionally registered end-use product, Frontiersman Bear Attack Deterrent. The active ingredient in this product is Capsaicin at a label nominal concentration of 2.0% a.i. This product is intended for use as a bear attack deterrent. With this package, the registrant has submitted product chemistry data to satisfy the storage stability (830-6317) and corrosion characteristics (830-6320) data requirements contained in MRID#s 467518-01, -02, -03, -04, and -05. The Technical Review Branch (TRB) has been asked to review this submission.

#### **SUMMARY OF FINDINGS**

TRB has reviewed this submission and reports the following findings:

1. The registrant has submitted the following studies:

Bensinger, M., "12 Month Shelf Life Test for Frontiersman 7.9 oz. and 9.2 oz. Bear Attack Deterrent", Chromtec Laboratory, Security Equipment Corporation, Guideline Ref #: 12M-1, October 7, 2007, MRID# 467518-01.

Bensinger, M., "12 Month Shelf Life Test HPLC Analysis of Frontiersman 9.2 oz. Bear Attack Deterrent", Chromtec Laboratory, Security Equipment Corporation, Guideline Ref #: 12M-2, October 7, 2007, MRID# 467518-02.

Bensinger, M., "12 Month Shelf Life Test HPLC Analysis of Frontiersman 7.9 oz. Bear Attack Deterrent", Chromtec Laboratory, Security Equipment Corporation, Guideline Ref #: 12M-3, October 7, 2007, MRID# 467518-03.

Bensinger, M., "12 Month Shelf Life Test of Frontiersman 9.2 oz. Sample Weight versus Time Results", Chromtec Laboratory, Security Equipment Corporation, Guideline Ref #: 12M-4, October 7, 2007, MRID# 467518-04.

Bensinger, M., "12 Month Shelf Life Test of Frontiersman 7.9 oz. Sample Weight versus Time Results", Chromtec Laboratory, Security Equipment Corporation, Guideline Ref #: 12M-5, October 7, 2007, MRID# 467518-05.

2. The registrant did not include a GLP statement in this submission.

3. The following is a brief synopsis of the study:

A one-year storage stability and corrosion characteristics study was conducted on the test substance stored in unspecified commercial packaging. The test conditions were not specified. It appears that samples were analyzed for active ingredient content after 12 months. Samples were analyzed by high performance liquid chromatography (HPLC) under unknown chromatographic conditions. Method validation was not included in the study.

The 12-month assay for the active ingredient content gave a value of 2.01% total capsaicin for the 7.9 and the 9.2 oz. samples. No evidence of corrosion or seal degradation was noted in either the 7.9 or 9.2 oz. canisters.

**CONCLUSIONS:**

TRB has reviewed this submission and concludes the following:

1. The studies listed in this report do not satisfy the data requirements for storage stability (830-6317) and corrosion characteristics (830-6320) for the end-use product, Frontiersman Bear Attack Deterrent. The registrant is advised to consult with the Agency for the proper conduct of the storage stability and corrosion characteristics studies. These data requirements are not satisfied because the study was not conducted according to the OPPTS Test Guidelines Series 830 Product Properties and the study did not follow appropriate GLP. Guidance should be sought from these sources before undertaking a new study.

# DATA PACKAGE BEAN SHEET

Date: 24-May-2006

Page 1 of 1

Decision #: 367536

DP #: (329258)

## \*\*\* Registration Information \*\*\*

Registration: 72265-1 - FRONTIERSMAN BEAR ATTACK DETERRENT

Company: 72265 - SECURITY EQUIPMENT CORPORATION

Risk Manager: RM 07 - John Hebert - (703) 308-6249 Room# PY1 S-7263

Risk Manager Reviewer: Daniel Peacock DPEACOCK

Sent Date: 06-Feb-2006

Calculated Due Date: 27-May-2006

Edited Due Date: \_\_\_\_\_

Type of Registration: Product Registration - Section 3

Action Desc: (360) ACTION INITIATED BY THE AGENCY;

Ingredients: 070701, Capsaicin(2%)

## \*\*\* Data Package Information \*\*\*

Expedite: ☐ Yes ☒ No

Date Sent: 24-May-2006

Due Back: \_\_\_\_\_

DP Ingredient: 070701, Capsaicin

DP Title: \_\_\_\_\_

CSF Included: ☐ Yes ☒ No

Label Included: ☐ Yes ☒ No

Parent DP #: \_\_\_\_\_

### Assigned To

Date In

Date Out

Organization: RD / TRB

Last Possible Science Due Date: 18-Mar-2006

Team Name: Chen

Science Due Date: 3-22-05

Reviewer Name: \_\_\_\_\_

Sub Data Package Due Date: \_\_\_\_\_

Contractor Name: \_\_\_\_\_

## \*\*\* Studies Sent for Review \*\*\*

No Studies

## \*\*\* Additional Data Package for this Decision \*\*\*

No Additional Data Packages

## \*\*\* Data Package Instructions \*\*\*

Chemist,

Please review these storage stability data (MRID 467518-01 thru -05) that the company submitted following the 12-22-2004 approval of an amendment that increased the % active from 1.4% to 2.0%. See memo for additional background information.

If you have any questions, please contact me.

Thank you,


Dan Peacock

PP  
5-06

May 23, 2006

## Note to John Hebert

**Subject** Frontiersman® Bear Attack Deterrent  
EPA Reg. No. 72265-1  
Submission of January 24, 20006  
Correct Action Code

**From** Dan Peacock, Biologist   
Insecticide-Rodenticide Branch

**Applicant** Security Equipment Corporation  
330 Sun Valley Circle  
Fenton, MO 63026

Attention: Mr. Robert Nance

**Issue** The correct action code for this submission is confusing because

1. the applicant claims that "This submission is being made for the amendment ... to increase the percentage of active ingredient from 1.4% to 2.0%", which implies a **new** amendment,
2. the applicant submits storage stability data, which implies a **completed** amendment in the past, and
3. the regulatory history is **unavailable** because the file has been sent for imaging.

**Research** A review of the Pesticide Product Labeling System (PPLS) and my personal files shows that EPA

1. registered this product originally as a **1.4%** Capsaicin product on July 17, 2000 and
2. approved an amendment for a **2.0%** Capsaicin product on December 22, 2004.

**Conclusion**

- The registrant sent these storage stability data as confirmatory that their product in two product sizes maintained its potency for one year.
- **This submission is neither a PRIA action nor a fast track.**
- **We should give this submission the code for confirmatory data and send it to the chemist for review.**

**File Location** Dan Peacock, Flash Drive 1, 256 mb, F:\Capsaicin\72265-1, Note to John Hebert, 5-23-2006.doc



January 24, 2006

Document Processing Desk  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
Room 266A, Crystal Mall 2  
1921 Jefferson Davis Highway  
Arlington, VA 22202

ATTN: Dan Peacock, Insecticide/Rodenticide Branch

Dear Mr. Peacock:

SUBJECT: Security Equipment Corporation  
Frontiersman® Bear Attack Deterrent  
EPA Registration Number 72265-1

This submission is being made for the amendment of EPA identification number 72265-1 to include each of the following:

- 1) to increase the percentage of active ingredient from 1.4% to 2.0%
- 2.) to switch to a more concentrated source of active
- 3.) to add a new 8 oz can to our current 9.2 oz can
- 4.) to revise the shot pattern study for the 9.2 oz can

Enclosed are the following items:

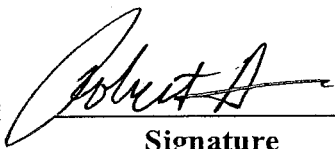
- 46751801** VOLUME 1 OF 5: 12 Month Shelf Life Test for 9.2 and 7.9 oz FRONTIERSMAN Bear Attack Deterrent:  
Bensinger, M. (2005): 12 Month Shelf Life and Stability Test. Unpublished study prepared by Chromtec, Hobe Sound, FL.
- 46751802** VOLUME 2 OF 5: HPLC Analysis of FRONTIERSMAN 9.2 oz sample:  
Bensinger, M. (2005): 12 Month HPLC Analysis of FRONTIERSMAN 9.2 oz sample. Unpublished study prepared by Chromtec, Hobe Sound, FL.
- 46751803** VOLUME 3 OF 5: HPLC Analysis of FRONTIERSMAN 7.9 oz sample:  
Bensinger, M. (2005): 12 Month HPLC Analysis of FRONTIERSMAN 7.9 oz sample. Unpublished study prepared by Chromtec, Hobe Sound, FL.
- 46751804** VOLUME 4 OF 5: Sample Weight versus Time 9.2 oz sample:  
Bensinger, M. (2005): Sample Weight versus Time for the FRONTIERSMAN 9.2 oz sample:  
Unpublished study prepared by Chromtec, Hobe Sound, FL.

330 Sun Valley Circle  
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(636) 343-1318 Fax

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<http://www.sabre-sabrered.com>

**46751805** VOLUME 4 OF 5: Sample Weight versus Time 7.9 oz sample:  
Bensinger, M. (2005): Sample Weight versus Time for the FRONTIERSMAN 7.9 oz sample  
Unpublished study prepared by Chromtec, Hobe Sound, FL.

**Company Official:** Robert Nance   
Name Signature

**Company Name:** SECURITY EQUIPMENT CORPORATION

**Company Contact:** Robert Nance 636-343-0200  
Name Phone